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Attorneys for Defendant  
HUAWEI DEVICES USA, INC.

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

*In re Carrier IQ, Inc. Consumer Privacy Litigation*  
[This Document Relates to All Cases]

Civil Case No.: C-12-md-2330-EMC

**DECLARATION OF SIMON J. FRANKEL**

1. I am a partner in the law firm of Covington & Burling LLP, counsel for Defendant Huawei Devices USA, Inc. ("Huawei") in this proceeding. Except where otherwise stated, the matters set forth herein are true and correct and of my own personal knowledge, and, if called as a witness, I could and would testify competently thereto.

2. I understand from our client that the Stipulation of Settlement and Release negotiated by the parties has been approved by Huawei. However, there has been a delay in obtaining the necessary signature from Huawei because the person with authority to sign on behalf of Huawei has been traveling overseas over the past week. I expect I will receive a copy of the Stipulation of Settlement and Release signed by Huawei within the next few business days.

3. Upon receipt of the Stipulation of Settlement and Release signed by Huawei, a fully-executed copy of the Stipulation of Settlement and Release with signatures of all parties will be filed with the Court.

1 I declare under penalty of perjury under the laws of the United States and the State of  
2 California that the foregoing is true and correct and that this declaration was executed in San Francisco,  
3 California on January 22, 2016.

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6 Simon J. Frankel